T. VanDonsel.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR-6J

October 29, 2002

Mr. Clarence L. Smith
Division of Remediation Management
Bureau of Land
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Subject: Clarification of U.S. EPA's Position With Regard to the Record of Decision for the Interstate Pollution Control (IPC) Site in Rockford, Illinois

Clarence

Dear Mr. Smith:

In September of 1999, the U.S. Environmental Protection Agency (U.S. EPA) reviewed the Record of Decision (ROD) for the Interstate Pollution Control (IPC) Site in Rockford, Illinois. The IPC ROD requires the implementation of Alternative #2, *Institutional Controls and Engineered Barrier, and Monitored Natural Attenuation of Groundwater*, with the Soil Vapor Extraction component of Alternative #3 maintained as a contingent remedial option. As described in the ROD, "the engineered barrier will be installed over the site to prevent direct contact with site contaminants, serve as an impermeable barrier to limit exposure to soil vapors, prevent fugitive dust emissions, and reduce storm-water infiltration through site fill, thereby reducing potential releases to groundwater." The ROD further explains that groundwater contamination beneath the IPC site will be remediated through monitored natural attenuation. A groundwater monitoring program will be implemented to "provide an indication of the effectiveness of the engineered barrier in preventing surface water infiltration and provide data to assess the rate of monitored natural attenuation of contaminants in groundwater." Quarterly and annual site inspections will be performed to ensure the integrity of the site fence and the condition of the engineered barrier and the monitoring well system. Groundwater data will be evaluated to gage the effectiveness of the remedy. If VOC concentrations do not decrease (and the lack of a decrease is not attributable to upstream sources), the implementation of a Soil Vapor Extraction system may be considered.

U.S. EPA supports the actions that were selected in the ROD for the IPC Site. However, U.S. EPA elected not to fully concur with the IPC ROD because of the identification of monitored

natural attenuation as the remedy for groundwater. U.S. EPA has determined that the IPC Remedial Investigation and ROD did not provide the necessary information to demonstrate that natural attenuation is occurring at the IPC Site. In addition, the ROD did not provide justification to show that the estimated cleanup time for groundwater (> 200 years) is reasonable when compared to an active groundwater treatment approach. However, U.S. EPA does not oppose the cleanup plan outlined in the ROD because U.S. EPA recognizes that the Illinois Pollution Control Board has the authority to manage areas of groundwater contamination by use of Groundwater Management Zones. The IPC Site is in an area of widespread groundwater contamination and is part of the Southeast Rockford Study Area. U.S. EPA agrees that, in conjunction with source control, it is acceptable to monitor and administratively manage the area of contaminated groundwater at the IPC site and between the IPC Site and the Rock River.

U.S. EPA expects that Illinois EPA will coordinate with the potentially responsible parties for the IPC Site and will proceed with implementation of the remedy. Please contact me at (312) 353-6553 if you have any questions concerning U.S. EPA's position on the IPC ROD.

Sincerely,

Wendy L. Carney
Chief, Remedial Response Branch #1
Superfund Division

cc: T. Van Donsel, SFD
C. Melodia, ORC
T. Ayers, IEPA